

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 1:18-CR-02945-WJ

JANY LEVEILLE, et al.,

Defendants.

**DEFENDANT HUJRAH WAHHAJ'S UNOPPOSED MOTION TO EXTEND TIME TO
SUBMIT OBJECTIONS TO THE UNITED STATES' SEALED SUPPLEMENTAL
BRIEFING REGARDING CO-CONSPIRATOR STATEMENTS**

Defendant Hujrah Wahhaj, by and through undersigned counsel, moves the court for an order extending her time to submit her specific objections to the United States' Sealed Supplemental Briefing Regarding Co-Conspirator Statements. The government does not oppose this motion. In support of this motion, Ms. Wahhaj states:

1. The current deadline set by the Court for Defendants to submit their responses and objections to the United States supplemental briefing regarding co-conspirator statements s June 23, 2023. That deadline has passed.

2. Defendant Hujrah Wahhaj reached out to the United States to request concurrence on an extension until Friday July 7, 2023 to submit her objections. The United States indicated that it does not oppose the extension.

3. The *James* hearing is set for July 19, 2023.

4. Hujrah Wahhaj's counsel required additional time to review the proposed statements and prepare objections.

5. Contemporaneously with this motion, Defendant will be filing her Objections and respectfully request that the court deem the Objections timely filed.

9. Counsel for the government does not oppose this motion.

WHEREFORE, Defendant Hujrah Wahhaj respectfully requests that the Court extend her deadline to submit objections to the United States Sealed Supplemental Briefing Regarding Co-Conspirator Statements to July 7, 2023 and that it deem the objections timely filed on that day.

Respectfully Submitted,

/s/ Donald F. Kochersberger III

Donald F. Kochersberger III
Business Law Southwest
320 Gold Ave. SW, Suite 610
Albuquerque, NM 87102
(505) 848-8581
Donald@BusinessLawSW.com

/s/ Marshall J. Ray

Marshall J. Ray
Law Offices of Marshall J. Ray, LLC
514 Marble Ave, NW
Albuquerque, NM 87111
(505) 312-2748
mray@mraylaw.com

Attorneys for Defendant Hujrah Wahhaj

CERTIFICATE OF SERVICE

I hereby certify that a copy of this pleading was served to all interested parties via the CM/ECF system on this 7th day of July 2023.

/s/ electronically filed

Marshall J. Ray